

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	CR. NO. 05-10227-PBS
v.)	
)	
WILGEN ANIBAL BRITO-MELO,)	
et al.,)	

ASSENTED TO MOTION OF THE GOVERNMENT
FOR AN EXTENSION OF TIME TO RESPOND TO MOTION
TO SUPPRESS AND FOR A CONTINUANCE OF HEARING DATE

The government hereby moves for an extension of time of approximately 45 days to respond to the defendant's motion to suppress and for a commensurate re-scheduling of the hearing on the defendant's motion. The government's response is currently due on March 17, 2006, and the hearing is scheduled for March 27, 2006. As grounds for this motion, the government states as follows. The undersigned counsel for the government is leaving the office next week for major surgery and will be out of the office for approximately 6-8 weeks. Consequently, new counsel for the government will be filing a notice of appearance and handling this matter in the interim. The request for additional time is necessary to allow replacement counsel time to familiarize themselves with the case and to respond to the motion. The defendants, through respective counsel, have assented to this request.

For the foregoing reasons, the government respectfully requests an extension of time of approximately 45 days to respond to the defendant's motion to suppress and for a commensurate re-scheduling of the hearing on the defendant's motion

Respectfully submitted,

MICHAEL J. SULLIVAN

United States Attorney

By: /s PETER K. LEVITT
PETER K. LEVITT
Assistant U.S. Attorney

March 7, 2006